

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

OMNIVISION TECHNOLOGIES, INC.,

Plaintiff,

v.

RE SECURED NETWORKS, LLC,

Defendant.

C.A. No. 24-187-JLH-CJB

**JURY TRIAL DEMANDED**

**STIPULATION AND [PROPOSED] ORDER TO AMEND SCHEDULING ORDER**

WHEREAS, the Court entered a Scheduling Order on July 31, 2024 (D.I. 35);

WHEREAS, Defendant has filed an unopposed motion for leave to amend its Answer, Defenses, and Counterclaims (D.I. 55) and

WHEREAS, the parties agree, subject to the approval of the Court, that certain modifications of the Scheduling Order are warranted in order for the parties to address the new counterclaim patent.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel and subject to the approval of the Court, that the Scheduling Order (D.I. 35) is amended as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Initial invalidity contentions	Nov. 5, 2024	Jan. 15, 2025
Exchange claim terms	Dec. 6, 2024	Feb. 13, 2025
Exchange constructions	Dec. 13, 2024	Feb. 20, 2025
Joint claim chart	Jan. 9, 2025	Mar. 6, 2025
Deadline to amend pleadings and add parties	Jan. 10, 2025	Unchanged
Opening claim construction brief	Feb. 18, 2025	Mar. 20, 2025

Event	Current Deadline	Proposed Deadline
Answering claim construction brief	Mar. 11, 2025	Apr. 10, 2025
Reply claim construction brief	Mar. 24, 2025	Apr. 24, 2025
Sur-reply claim construction brief	Mar. 31, 2025	May 1, 2025
Joint claim construction brief	Apr. 4, 2025	May 7, 2025
Response to claim construction tutorial	Apr. 11, 2025	May 14, 2025
Claim construction hearing	Apr. 30, 2025	June 3, 2025
Substantial completion of document production	May 8, 2025	June 26, 2025
Final infringement contentions	July 29, 2025	Sept. 10, 2025
Final invalidity contentions	Aug. 26, 2025	Sept. 24, 2025
Fact discovery cutoff	Sept. 30, 2025	Oct. 8, 2025
Interim status report	Oct. 6, 2025	Oct. 21, 2025

All other provisions of the Scheduling Order remain unchanged.

Pursuant to D. Del. LR 16.4, counsel hereby certify that a copy of this stipulation setting forth the requested amendments to the Scheduling Order was sent to their respective clients prior to submission to the Court.

Dated: October 25, 2024

RICHARDS, LAYTON & FINGER, P.A.

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*Attorneys for Defendant and Counterclaim-  
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SO ORDERED this \_\_\_\_\_ day of October 2024.

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The Honorable Christopher J. Burke  
United States Magistrate Judge